



April 4, 2022

Rajinder Sahota, Deputy Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Via portal: <https://ww2.arb.ca.gov/applications/public-comments#COMM2>

Re: Environmental Justice Concerns Regarding Electric Sector Modeling

Dear Rajinder Sahota:

The undersigned environmental justice and advocacy organizations provide the following comment on the electric sector modeling for the 2022 Climate Change Scoping Plan Update ("Scoping Plan"). The missteps reflected in the initial electric sector modeling must be addressed immediately by the California Air Resources Board ("CARB") if the Scoping Plan is to meet its legislative mandate to address climate change.¹

By Including Only a Single Alternative that Reaches 0 MMT, the Electric Sector Modeling Blocks Equity Analysis

CARB must center environmental justice throughout the Scoping Plan process, yet the range of scenarios modeled for the electric sector actively impedes progress toward environmental justice, and does not reflect the Environmental Justice Advisory Committee ("EJAC") sector recommendations. Specifically, the electric sector modeling includes four scenarios: Alternative 1, which "has a 0 MMT by 2035 target with no Combustion" and three scenarios that "remain at around 30 MMT through 2050."² Inexplicably, the staff presentation slides claim the final three scenarios, called Alts 2, 3 and 4, "all feature an SB100 100% of retail

¹ Comments regarding modeling and analyses for other sectors will be submitted as well. These comments highlight specific shortcomings in the electricity sector modeling.

² CARB Draft Scoping Plan: AB32 Source Emissions Initial Modeling Results March 15, 2022, slide 23
<https://ww2.arb.ca.gov/sites/default/files/2022-03/SP22-Model-Results-E3-ppt.pdf> (last visited 4/4/22.)

sales clean energy target by 2045.”³ The EJAC’s feedback emphasized that, while we must achieve a zero-carbon grid by 2035, “the transition to a zero carbon electricity grid must prioritize distribution of benefits to the most affected and most vulnerable communities. A ‘carbon free grid’ is different from a grid powered by renewables. It is necessary to identify the fuels and generation sources that would support that grid.” Studying only a single alternative that reaches 0 MMT by 2035 does not allow an assessment of the distribution of benefits to the most affected and most vulnerable communities. To the contrary, the modeling must consider multiple options to achieve a zero-carbon grid by 2035.

All Modeled Alternatives Must Achieve 0 MMT

CARB should revise Alternatives 2, 3, and 4 to include GHG emissions levels that reflect statutory, regulatory and policy mandates. No court has agreed with industry advocates regarding the “retail sales” language in SB 100 allowing some fossil fuels to remain on the grid, and CARB’s role is to model alternatives that achieve GHG emissions reductions, not solely to incorporate renewable portfolio standard inputs.⁴ Alternative 2 and either Alternative 3 or 4 should reach 10 MMT by 2035 with all four alternatives achieving 0 MMT by 2045. This would reflect both the need for ambitious reductions and allow comparisons among technologies and rates of renewables build. Further, in response to EJAC requests, CARB has already committed to studying a 10 MMT-by-2035 scenario. In the January 25, 2022 workshop, CARB noted that it had made following modification “2035 sector GHG target reduced to 0 MMTCO₂e (Alt 1) and 10 MMTCO₂e (Alt 2) in 2035.”⁵ Yet three months later, CARB’s presentation does not reflect this change.

Modeling Must Assume Gas Plants Retire, and No New Gas Capacity is Added

Gas-fired power plants are disproportionately located in California’s environmental justice communities. As grid operations shift, plant cycling is increasing, which increases impacts to surrounding communities. Disturbingly, no scenario, not even the “no combustion” scenario, assumes retirement of the full gas-fired generation fleet. Further, all four scenarios assume new gas-fired generation is built.⁶ This treatment of harmful gas generation as a perpetual component of California’s energy future is unsupported and unjust.

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³ *Id.*

⁴ If it were the case that only electricity generated for retail sales were subject to SB 100, CARB scenarios would have to show a technical basis for assuming non-retail sales generation accounts for 30 MMT.

⁵ Update on PATHWAYS Scenario Modeling Assumptions (Jan. 25, 2022), slide 3,

https://ww2.arb.ca.gov/sites/default/files/2022-01/Scenario%20Slides%20for%20Jan25%20EJAC%20Mtg_01242022.pdf.

⁶ CARB Draft Scoping Plan: AB32 Source Emissions Initial Modeling Results March 15, 2022, slide 25 (showing cumulative new resource capacity build in 2035, including Alternative 1 retiring ~7GW of gas capacity and ~6GW of new gas build for capacity; slide 26 (showing new gas for all alternatives by 2045).

<https://ww2.arb.ca.gov/sites/default/files/2022-03/SP22-Model-Results-E3-ppt.pdf> (last visited 4/4/22.)

Respectfully submitted,

/s/

Shana Lazerow
Legal Director
Communities for a Better Environment

Neena Mohan
Climate & Air Campaign Manager
California Environmental Justice Alliance

Amee Raval
Policy & Research Director
Asian Pacific Environmental Network

Sofi Magallon
Policy Advocate
Central Coast Alliance United for a
Sustainable Economy (CAUSE)

Ari Eisenstadt
Campaign Manager
Regenerate California

Teresa Cheng
Campaign Representative
Sierra Club (California)
My Generation Campaign